

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - Detroit

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**STIPULATION FOR ORDER GRANTING LIMITED  
RELIEF FROM THE AUTOMATIC STAY AND FOR  
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)**

Gary Segatti by and through his counsel, Osipov Bigelman, P.C. and Debtor, City of Detroit, Michigan, by and through counsel, Jones Day stipulate to the entry of the attached order granting relief from stay consistent with the terms of the attached order. The parties anticipate that this stipulation will allow Segatti and his clients to file property tax appeals prior to the expiration of the statutory deadline on July 31, 2013. Relief is limited to permitting the filing of the appeals at this time.

**OSIPOV BIGELMAN, P.C.**

/s/ William C. Blasses

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**JONES DAY**

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July 31, 2013

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Upon consideration of the parties' Stipulation for an Order Granting Relief From the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3), and the Court being duly advised of the premises;

IT IS ORDERED that:

- 1) Relief from that automatic stay applicable under 11 U.S.C. § 922(a) and 11 U.S.C. § 362(a) is GRANTED for the limited purpose of allowing the Gary Segatti and his clients to take all steps necessary to file property tax appeals against the City of Detroit. However, Gary Segatti and his clients shall not take any action to prosecute the appeals or collect any refund of any pre-petition property tax overpayment absent further order of this Court.
- 2) This Court finds that Rule 4001 (a) (3) of the Federal Rules of Bankruptcy Procedure is waived, and Gary Segatti and his clients may immediately file and commence property tax appeals against the City of Detroit.

**EXHIBIT A**